

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

EVA EASON, MEGHAN PARKER, NATIONAL
FEDERATION OF THE BLIND, and the CENTER
FOR INDEPENDENCE OF THE DISABLED,
NEW YORK,

Plaintiffs,

v.

NEW YORK STATE BOARD OF ELECTIONS,
NEW YORK STATE DEPARTMENT OF MOTOR
VEHICLES, TODD D. VALENTINE and ROBERT
BREHM, in their official capacities as Co-Executive
Directors of the Board of Elections, THERESA
EGAN, in her official capacity as Executive Deputy
Commissioner of the Department of Motor Vehicles,
and GREGORY J. KLINE, in his official capacity as
Deputy Commissioner for Administration of the
Department of Motor Vehicles,

Defendants.

CIVIL ACTION NO. 1:16-cv-04292

**PLAINTIFF EVA EASON'S
SECOND INTERROGATORIES**

TO: Defendants New York State Board of Elections and New York State Department
of Motor Vehicles

FROM: Plaintiff Eva Eason

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 33 of the Federal Rules of Civil
Procedure, as well as Local Civil Rules 26.3 and 33.3 of the Southern District of New York,
Plaintiff Eva Eason, by her attorneys, propounds the following interrogatories to be answered by
Defendants, under oath. The information provided in response to these interrogatories must be
given under oath whether it is secured by you, your agent, servant, representative, or attorney, or

any other person who has made this information known to you or from whom you can obtain this information and who is competent to testify as to the facts stated.

Defendants are required to serve written responses within thirty (30) days of service hereof. In answering these interrogatories, Defendants are requested to furnish all information, including hearsay, in possession of Defendants' attorneys, agents, investigators, employees, independent contractors, and all other persons acting on behalf of Defendants, and not merely information known by personal knowledge of the person answering these interrogatories. A response to one interrogatory or part of an interrogatory may be incorporated by reference into a response to another interrogatory or parts thereof. These interrogatories are continuing requests and require production of information discovered or prepared after your initial responses to these interrogatories.

DEFINITIONS

1. "Defendant," "Board of Elections," "Department of Motor Vehicles," "You," or "Your" refers to Defendant New York State Board of Elections and Defendant New York State Department of Motor Vehicles, respectively, including all predecessors and/or successors, parents, subsidiaries, divisions, and related or affiliated organizations, as well as any past or present member, director, officer, agent, employee, counsel, investigator, or any other person or entity (apparently or actually) representing or acting for or on its behalf.

INTERROGATORIES

INTERROGATORY NO. 9

State all facts that you contend support Defendants' Affirmative Defense No. 1.

INTERROGATORY NO. 10

State all facts that you contend support Defendants' Affirmative Defense No. 2.

INTERROGATORY NO. 11

State all facts that you contend support Defendants' Affirmative Defense No. 3.

INTERROGATORY NO. 12

State all facts that you contend support Defendants' Affirmative Defense No. 4, including but not limited to: fundamental alteration, undue administrative and/or financial burden or hardship, and feasibility.

Dated: July 21, 2017
New York, New York



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